

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

GMAC Mortgage, LLC (f/k/a GMAC Mortgage *
Corporation), *
Plaintiff *
*
v. *
* Civil Action No.
* 1:08-CV-00428-PB
Schaefer Mortgage Corporation, Timothy *
Amsden, Timothy Beaudoin, Rich Boisvert, *
John Gaglia, Denise Johnson, Jake *
Pelletier and Sam Pirri, *
Defendants *
*

DEFENDANT DENISE JOHNSON'S ASSENTED-TO MOTION
TO EXTEND TIME II

NOW COMES the Defendant, Denise Johnson ("Johnson"), by and through her counsel, Wilson, Bush, Durkin & Keefe, and respectfully requests to extend time for filing an Objection to Plaintiff's Amended Motion for Preliminary Injunction and Plaintiff's Amended Motion for Temporary Restraining Order and, in support thereof states as follows:

1. On October 27, 2008, the Plaintiff filed its Amended Motion for Preliminary Injunction. Defendant's Objection to this motion is due on or about November 13, 2008.
2. On October 27, 2008, Plaintiff filed its Amended Motion for Temporary Restraining Order. Defendant's Objection to this Motion is due on or about November 13, 2008.

3. The parties have notified the Court that this matter has settled. The parties' Stipulation of Dismissal is due on or before December 12, 2008.

4. Accordingly, Johnson respectfully requests that the deadline for filing her Objections to Plaintiff's Amended Motion for Preliminary Injunction and Temporary Restraining Order be extended until December 12, 2008, should it become necessary to file these responsive pleadings.

5. All counsel in this case assent to the relief sought herein.

6. Due to the nature of this Motion, no memorandum of law is necessary.

WHEREFORE, Denise Johnson requests that this Court:

A. Extend the time for Johnson to file her Objection to Plaintiff's Amended Motion for Preliminary Injunction;

B. Extend the time for Johnson to file her Objection to Plaintiff's Amended Motion Temporary Restraining Order;

C. Grant such further relief as this Court deems necessary and just.

Respectfully submitted,

DENISE JOHNSON

By Her Attorneys,

WILSON, BUSH, DURKIN & KEEFE

Dated: November 13, 2008

By: /s/ Charles J. Keefe
Charles J. Keefe, # 14209
184 Main Street, Suite 222
Nashua, New Hampshire 03060
(603) 595-0007

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendant Denise Johnson's Assented-to Motion to Extend Time to File Answer was this day forwarded to John A. Houlihan, Esq., Robert G. Young, II, Esq., William E. Christie, Esq., James D. Rosenberg, Esq., Brian Quirk, Esq. and Marc W. McDonald, Esq. opposing counsel.

Dated: November 13, 2008

/s/ Charles J. Keefe